

UNDER SEAL
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USDC-OR

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:20-cr-506 Hz

v.

INDICTMENT

HAWAZEN SAMEER MOTHAFAR,
Defendant.

18 U.S.C. §§ 2339B(a)(1), 1546(a) and
1001(a)(2)

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Provide Material Support to a Designated
Foreign Terrorist Organization)
(18 U.S.C. § 2339B(a)(1))

Introductory Allegations:

1. At times material to this Indictment:

a. HAWAZEN SAMEER MOTHAFAR was a legal permanent resident of
the United States residing in the Portland, Oregon area.

ISIS

b. On or about October 15, 2004, the United States Secretary of State
designated al-Qa'ida in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a foreign
terrorist organization under Section 219 of the Immigration and Nationality Act and as a
Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

c. On or about May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a foreign terrorist organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant as its primary name. The Secretary also added the following aliases to the foreign terrorist organization listing: The Islamic State of Iraq and al-Sham (*i.e.*, "ISIS"—which is how the foreign terrorist organization will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production.

d. On or about September 21, 2015, the Secretary of State added the following aliases to the foreign terrorist organization listing: Islamic State, ISIL, and ISIS.

e. On or about March 21, 2019, the Secretary of State added the following aliases to the foreign terrorist organization listing: Amaq News Agency and Al Hayat Media Center. To date, ISIS remains a designated foreign terrorist organization.

SALECK OULD CHEIKH MOHAMEDOU

2. On December 21, 2016, the Department of State designated Saleck Ould Cheikh Mohamedou (Mohamedou) as a Specifically Designated Global Terrorist (SDGT) under Executive Order 13224. Mohamedou is an al-Qa'ida in the Islamic Maghreb operative who was incarcerated in Mauritania after his 2011 conviction for multiple acts of terrorism.

THE ISIS CENTRAL MEDIA OFFICE, AKA DIWAN

3. The Diwan al-I'lam al-Markazi is the ISIS central media organization responsible for coordinating ISIS's media efforts and provides guidance to ISIS media supporters.

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THE SUNNI SHIELD FOUNDATION AND AL-ANFAL

4. Al Dura'a al Sunni (Sunni Shield), is a pro-ISIS, internet-based media organization that published *Al-Anfal* newspaper and disseminates pro-ISIS information, including written and video content, as well as infographics. *Al Anfal* advocates violent jihad and in supporting the goals of the Islamic State, coordinates with the Diwan and responds to their instructions.

SOCIAL MEDIA PLATFORM A

5. Social Media Platform A is a mobile and desktop messaging application. Social Media Platform A allows users to communicate with each other in chat rooms called channels. Channels can be set up as private, with only approved users allowed access.

THE CONSPIRACY

6. The Grand Jury realleges and incorporates by reference paragraphs 1 through 5 of this Indictment.

7. Beginning no later than February 2015 and continuing through November 5, 2020, in the District of Oregon and elsewhere, **HAWAZEN SAMEER MOTHAFAR** conspired with others both known and unknown to the Grand Jury, to provide material support and resources, namely, services, to a foreign terrorist organization, namely, ISIS, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaged in terrorist activity and terrorism.

MANNER AND MEANS OF THE CONSPIRACY

8. It was part of the conspiracy that **MOTHAFAR** and co-conspirators would edit, produce, and disseminate ISIS propaganda and recruiting material through various social media platforms in coordination with and on behalf of ISIS.

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9. It was part of the conspiracy that **MOTHAFAR** would serve as the conduit for receiving input directly from ISIS and provide instructions based on that input to Sunni Shield members.

10. It was part of the conspiracy that **MOTHAFAR** would manage and create a “bot” – a software application that is programmed to respond to instructions and inquiries – for Sunni Shield members that would help answer questions, spread information, and anonymize user identities.

11. It was part of the conspiracy that **MOTHAFAR** would moderate private chat rooms and channels dedicated to supporting ISIS through the Sunni Shield Foundation.

12. It was part of the conspiracy that **MOTHAFAR** would assign tasks and control access to pro-ISIS chat rooms and channels devoted to the production of *Al Anfal* and the Sunni Shield Foundation.

13. It was part of the conspiracy that **MOTHAFAR** and co-conspirators concealed, misrepresented, and hid, and caused to conceal, misrepresent, and hide the existence, purpose, and acts done in furtherance of the conspiracy.

OVERT ACTS

14. In furtherance of the conspiracy and to accomplish its objectives and purposes, defendant and others committed and caused to be committed the following overt acts:

a. In February 2019, **MOTHAFAR** pledged allegiance, or ba’yat, to ISIS and reaffirmed that he had been an ISIS supporter since 2014.

b. Between November 2017 and March 2019, **MOTHAFAR** edited, produced, published, and disseminated 32 issues of *Al-Anfal* newspaper.

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- c. On November 29, 2017, Issue 2 of *Al-Anfal* was released by **MOTHAFAR**. It contained an article entitled “Effective Stabbing Techniques” that provides detailed guidance how to best kill and maim in a knife attack.
- d. On December 20, 2017, Issue 4 of *Al-Anfal* was released by **MOTHAFAR**. It contained an article entitled “How Does a Detonator Work” that contains a tutorial on the use of explosive ignition devices.
- e. On December 20, 2017, Issue 4 of *Al-Anfal* was released by **MOTHAFAR**. It contained a two part infographic containing a picture of the Eiffel Tower and Statue of Liberty on fire with the caption, partially in Arabic and English, which read: “Soon in the Heart of Your Lands.”
- f. On June 21, 2018, Issue 17 of *Al-Anfal* was released by **MOTHAFAR**. It contained an article encouraging readers to carry out attacks in their country of origin if they are unable to travel to areas where ISIS is actively engaged in fighting.
- g. Throughout 2018, **MOTHAFAR** communicated with ISIS supporters while moderating a channel on Social Media Platform A entitled “Designers Workshop – Sunni Shield.”
- h. Throughout 2018, **MOTHAFAR** managed and created a “bot” for Sunni Shield at the request of Sunni Shield members.
- i. On October 28, 2018, **MOTHAFAR** issued a call for content to be published in *Al-Anfal* after ISIS victories in northern Syria: “In light of the victories that have been accomplished by the believers in Baghuz, Susah, and other areas, we urge all good brothers to support them by producing short articles and videos.”

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j. On November 2, 2018, **MOTHAFAR** shared 70 images of explosives and western cities with Sunni Shield members, telling them, “the images of destroyed infidel cities will be useful.”

k. On November 25, 2018, **MOTHAFAR** solicited Mohamedou, also known as “Abu Qaswarah al-Shanqiti,” to write an editorial for *Al-Anfal* that would incite readers to mobilize for duty. Mohamedou provided the text of an editorial, the content of which appeared in Issue 26 of *Al-Anfal*. The editorial encouraged violent jihad and argued that “a believer should not have any excuse for not joining the mujahidin.”

l. On April 2, 2019, **MOTHAFAR** told the Sunni Shield graphic design workshop membership to get ready for “an official campaign” and help gather information from members for use by the Diwan.

m. On January 25, 2019, in an online conversation with an unknown ISIS supporter, **MOTHAFAR** expressed concern about revealing his identity while using his true name in connection with Sunni Shield because “if published for the foundation, it could mean 4 terror.”

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2
**(Conspiracy to Provide Material Support to a Designated
Foreign Terrorist Organization)**
(18 U.S.C. § 2339B(a)(1))

1. The Grand Jury realleges and incorporates by reference paragraphs 1 through 5 of Count One of this Indictment.

THE CONSPIRACY

2. Beginning no later than February 2015 and continuing through November 5, 2020, in the District of Oregon and elsewhere, **HAWAZEN SAMEER MOTHAFAR** conspired with **Indictment**

others both known and unknown to the Grand Jury, to provide material support and resources, namely, personnel and services, to a foreign terrorist organization, namely, ISIS, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaged in terrorist activity and terrorism.

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that **MOTHAFAR** would open social media and email accounts within the United States on behalf of and to be used by ISIS supporters and ISIS officials in a manner intended to defeat the providers' security protocols. A senior ISIS official in custody in Iraq told investigators that it was **MOTHAFAR**'s job to provide ISIS "new accounts when we needed new accounts as soon as possible."

4. It was part of the conspiracy that **MOTHAFAR** would provide counsel and logistical assistance to ISIS supporters and officials.

OVERT ACTS

5. In furtherance of the conspiracy and to accomplish its objectives and purposes, defendant and others committed and caused to be committed the following overt acts:

- a. On October 26, 2016, **MOTHAFAR** opened a Facebook account for a senior ISIS official currently in custody in Iraq.
- b. In April 2017, **MOTHAFAR** created a secure email account for an ISIS member located overseas.
- c. In December 2019, **MOTHAFAR** attempted to acquire information on the piloting and control of a drone which would be "carrying an object" for Saleck Ould Cheikh Mohamedou.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 3

(Providing and Attempting to Provide Material Support to a Designated Foreign Terrorist Organization)
(18 U.S.C. § 2339B(a)(1))

Beginning no later than February 2015 and continuing through November 5, 2020, in the District of Oregon and elsewhere, **HAWAZEN SAMEER MOTHAFAR** knowingly provided and attempted to provide material support and resources, namely, personnel and services, to a foreign terrorist organization, namely ISIS, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaged in terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 4

(False Statements in an Immigration Application)
(18 U.S.C. § 1546(a))

On October 26, 2018, in the District of Oregon, **HAWAZEN SAMEER MOTHAFAR**, knowingly subscribed as true under penalty of perjury under Section 1746 of Title 28 of the United States Code a false statement. When asked on the Form N-400, “Have you ever been a member of or in any way associated (either directly or indirectly) with: A Terrorist Organization,” defendant **HAWAZEN SAMEER MOTHAFAR** falsely stated “NO” by checking a box, when in fact as he knew and continues to know he has associated directly and indirectly with ISIS, a designated foreign terrorist organization.

In violation of Title 18, United States Code, Section 1546(a).

COUNT 5

(False Statement to a Government Agency)
(18 U.S.C. § 1001(a)(2))

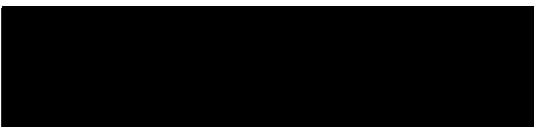
On August 24, 2020, in the District of Oregon, **HAWAZEN SAMEER MOTHAFAR**, willfully and knowingly made a materially false, fictitious, and fraudulent statement and **Indictment**

representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by making false oral statements during an interview with an official of the United States Citizenship and Immigration Services, a component of the Department of Homeland Security, in connection with his application to become a Naturalized United States Citizen. When asked whether he had been involved with any kind of terrorist organization, **MOTHAFAR** shook his head, indicating “No,” repeatedly. When asked whether he knew anyone involved in any terrorist organizations, **MOTHAFAR** shook his head “No.” And when asked whether he knew anyone associated in any way with any foreign terrorist organizations, **MOTHAFAR** shook his head “No.”

In violation of Title 18, United States Code, Section 1001(a)(2).

Dated: November 3, 2020

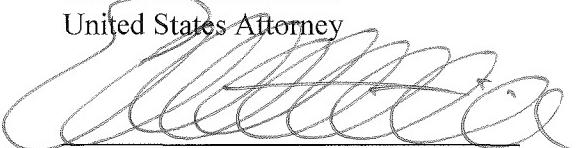
A TRUE BILL.



OFFICIATING FOREPERSON

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